



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DGR  
F. #2016R01326

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 10, 2023

By ECF

The Honorable Margo K. Brodie  
Chief United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Herman Segal,  
Criminal Docket No. 20-551 (MKB)

Dear Chief Judge Brodie:

The government writes in connection with the above-captioned matter, and with the consent of defense counsel, to respectfully request a thirty day adjournment of the status conference currently scheduled for May 10, 2023 at 10:00 a.m.

On May 8, defense counsel informed the government that they are preparing to produce additional discovery to the government. The government expects this defense discovery to be material to the ongoing plea negotiations between the parties. Having conferred with each other, the parties jointly request that the Court adjourn the currently scheduled status conference for thirty days. In addition, with the consent of defense counsel,

the government also asks the Court to exclude time under the Speedy Trial Act through the new status conference date, which exclusion is in the interests of justice.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/Drew G. Rolle  
Drew G. Rolle  
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(718) 254-6783

cc: James Mahon, Esq. (Counsel to the defendant) (by ECF)  
Samantha Lesser, Esq. (Counsel to the defendant) (by ECF)